

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SHAMEL ERVIN,

Plaintiff,

-against-

07 CV 2981 (JSR)

THE CITY OF NEW YORK, POLICE OFFICER  
RANDON RUSH, POLICE OFFICER KEN MIKLAS,  
SERGEANT JOSEPH QUIGLEY,

Defendants.

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**PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS**

Pursuant to Fed. R. Civ. P. 47(a), plaintiff requests that the Court ask the prospective jurors the following questions:

1. Where do you reside? (city, neighborhood, town, and/or county)
2. What is your occupation?
3. What is your spouse's occupation?
4. What are the occupations of your children?
5. What are your hobbies?
6. What do you do in your spare time?
7. Have you ever been the victim of a crime? If so, did you find the police to be helpful, professional, and courteous?
8. Have you ever had any negative encounters with the police? If so, what happened and what made the experience negative?
9. Have you ever had any positive encounters with the police? If so, what happened and what made the experience positive?

10. Have you ever been employed in law enforcement? If so, please describe?  
Would your prior position interfere with your ability to be fair to the plaintiff?

11. Do you have any relatives or friends who are employed, or were previously employed, in law enforcement? If so, please describe. Would your relationship with that person, or what you have heard from that person, interfere with your ability to be fair to the plaintiff?

12. Do you believe that a police officer is more likely to tell the truth than someone who is not a police officer?

13. Are you more likely to believe a police officer over a person who is not a police officer?

14. Do you feel that it is possible for a police officer to take an oath to tell the truth, take the witness stand in this courtroom, and lie?

15. Do you watch crime dramas on television? If so, which shows do you watch? Do you feel that these shows accurately portray the police? If so, in what way?

16. Other than a family member, what person, living or deceased, do you most admire? What is your reason for choosing this person?

DATED: November 19, 2007  
Brooklyn, New York

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By:

*Richard J. Cardinale*

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RICHARD J. CARDINALE (RC-8507)